

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN C. SHORES, Jr.,

Defendant.

8:23CR174

MOTION TO RECONSIDER
DETENTION

COMES NOW the United States, by and through Kelli L. Ceraolo, Assistant United States Attorney, and hereby moves this Court to revoke the order releasing Defendant John C. Shores, Jr. on Conditions [#21] and reopen the hearing on detention pursuant to 18 U.S.C. § 3142(f)(2).

In support of this motion, the Government asserts the following:

1. On August 10, 2023, Defendant was arrested on a Criminal Complaint warrant. On August 16, 2023, the Government's Motion for Detention was denied and Defendant was released on conditions. [#33].
2. Also on August 16, 2023, a search warrant was filed (8:23MJ446) authorizing the search of cell phones in Defendant's possession at the time of his contact with law enforcement on August 10, 2023. Federal agents have conducted a preliminary review of Defendant's cell phones and have obtained evidence relevant to this Court's determination of the danger posed by Defendant's release.
3. Specifically, Defendant's phones show multiple attempts to meet minors for sex, including a conversation with a person who repeatedly indicates that she is 11 years old; a conversation with a now identified 14-year-old female; and a conversation with a person who indicates she is 16 years old. In addition to pressuring the minors to meet for the purpose of sex,

Defendant asks the 11-year-old to send images of herself and offers money to the 14-year-old and 16-year-old in exchange for sex. In addition, Defendant's devices show that Defendant sought child pornography from other users offering to distribute child pornography online.

4. The evidence observed on Defendant's devices was not previously known to the Government or the Court and shows repeated, aggressive attempts to meet with minors for the purpose of sex; solicitation of minors for commercial sex; and requests for minors to produce child pornography. Defendant's conduct reflects that his release poses a significant danger to the community.

The Government is requesting that an evidentiary hearing be set on this Motion to Reconsider Detention.

Respectfully submitted,

UNITED STATES OF AMERICA,

By: s/ Kelli L. Ceraolo
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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all registered participants.

s/ Kelli L. Ceraolo
Assistant U.S. Attorney